

COHEN, FRANKEL
ATTORNEYS
20 VESEY STREET
NEW YORK, NY 10038
(212) 732-0002

MARK I. COHEN
PETER M. FRANKEL
LOUIS J. RUGGIERO
MINA KENNEDY
GILLIAN M. FEEHAN*

*ADMITTED IN NJ AND PENDING ADMISSION IN NY

VIA ECF

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Application granted.

Defendant Taveras Abreu is permitted to travel to the Monroe County Courthouse, located at 610 Monroe Street in Stroudsburg, PA, on May 12, 16, and 22-26, 2023 for his 8:30 a.m. court appearances.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 125.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
May 10, 2023

**Re: *United States v. Julio Alberto Taveras Abreu*
23 Cr. 64 (PMH)**

Dear Judge Halpern:

Please recall that Peter Frankel, Esq., and I represent Mr. Julio Alberto Taveras Abreu in the above-referenced matter. For the reasons that follow, I write to respectfully request that Your Honor permit Mr. Taveras Abreu to travel to the Commonwealth of Pennsylvania on May 12, 16, and 22-26, 2023 for court appearances in a pending criminal prosecution against him in the Monroe County Court of Common Pleas. I have consulted with A.U.S.A. Kevin Sullivan and United States Pretrial Services Officer Laura Gialanella, both of whom have no objection to this request.

Currently, Mr. Taveras Abreu is at liberty on a \$100,000 personal recognizance bond set before the Magistrate Judge Judith C. McCarthy on December 2, 2021. The terms of the bond are as follows: travel restricted to the Southern and Eastern Districts of New York and, upon application to the Court, to Pennsylvania for court appearances; the surrender of all travel documents to Pretrial Services and no new applications; supervision as directed by Pretrial Services; and GPS monitoring and home detention. On March 4, 2022, Magistrate Judge Paul E. Davidson modified Mr. Taveras Abreu's bail conditions to permit him to attend religious services at Iglesia Casa de Jehova in White Plains, New York, and to permit him to travel to our Manhattan office when necessary, without needing to obtain pre-approval from Pretrial Services. On April 1, 2022, Judge McCarthy modified Mr. Taveras Abreu's bail conditions to permit him to obtain employment. Mr. Taveras Abreu has been granted permission to travel to the Monroe County Court of Common Pleas on several occasions and has completed all trips without issue. Finally, at his change of plea hearing on February 23, 2023, Your Honor ordered that Mr. Taveras Abreu's bail conditions be continued as set.

Mr. Taveras Abreu is presently scheduled to appear in the Monroe County Court of Common Pleas on May 12, 2023, and May 16, 2023, and his case is scheduled for trial from May

Cohen, Frankel & Ruggiero, LLP

U.S. v. Julio Alberto Taveras Abreu

May 10, 2023

Page 2 of 2

22, 2023 through May 26, 2023. If granted the requested modification, Mr. Taveras Abreu would travel to the Monroe County Courthouse, located at 610 Monroe Street in Stroudsburg, Pennsylvania, for his 8:30 a.m. court appearances. Mr. Taveras Abreu would then promptly return to his residence. Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Mark I. Cohen", with a horizontal line extending to the right.

Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Kevin Sullivan (via ECF)
U.S.P.T.S.O. Laura Gialanella (via ECF)
Mr. Julio Alberto Taveras Abreu (via email)